

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Campbell Family Enterprises, Inc, Debtor

**Case No. 25-10364-SDM
CHAPTER 11**

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Hearing Notice and Motion to Dismiss were forwarded on July 11, 2025, by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix):

By Electronic CM/ECF Notice:

Robert A. Byrd, Trustee

Arnulfo U. Luciano, Attorney for Creditor

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:
CAMPBELL FAMILY ENTERPRISES, INC

CASE NO: 25-10364
**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**
Chapter: 11

On 7/11/2025, I did cause a copy of the following documents, described below,
Hearing Notice and Motion to Dismiss

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/11/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:
CAMPBELL FAMILY ENTERPRISES, INC

CASE NO: 25-10364
**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 11

On 7/11/2025, a copy of the following documents, described below,
Hearing Notice and Motion to Dismiss

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/11/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
05371
CASE 25-10364-SDM
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN
THU JUL 10 17-00-24 CDT 2025

AMUR
PO BOX 911685
DENVER CO 80291-1685

AMERICAN EXPRESS
PO BOX 297800
FORT LAUDERDA FL 33329-7800

AMERICAN EXPRESS NATIONAL BANK
CO BECKET AND LEE LLP
PO BOX 3001
MALVERN PA 19355-0701

AMUR EQUIPMENT FINANCE INC
CO KYE LAW GROUP PC
201 OLD COUNTRY ROAD SUITE 120
MELVILLE NY 11747-2725

ARNOLD U LUCIANO
JACKS GRIFFITH LUCIANO PA
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CLEVELAND MS 38732-1209

EXCLUDE

ROBERT A BYRD
BYRD WISER
~~P O BOX 1939~~
BILOXI MS 39533-1939

ROBERT ALAN BYRD
145 MAIN STREET
P O BOX 1939
BILOXI MS 39533-1939

CFG MERCANT SOLUTIONS
180 MAIDEN LANE
FLOOR 15
NEW YORK NY 10038-5150

DEBTOR

(P) CORPORATE BILLING
ATTN JANICE HEARD
PO BOX 1726
DECATUR AL 35602-1726

CAMPBELL FAMILY ENTERPRISES INC
1214 WAVERLY AVE
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CAPITAL ONE BANK
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CITY OF INDUS CA 91716-0519

CAPITAL ONE NA
BY AIS INFOSOURCE LP AS AGENT
PO BOX 71083
CHARLOTTE NC 28272-1083

CHASE
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WILMINGTON DE 19886-5548

CLEVELAND STATE BANK
PO BOX 1000
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CLEVELAND STATE BANK
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110 COMMERCE AVE
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(P) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
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PHILADELPHIA PA 19101-7346

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STE 4430
JACKSON MS 39201-5025

LIFT FUND INC
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SAN ANTONIO TX 78210-3541

LIFT FUND INC
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MISSISSIPPI DEPARTMENT OF REVENUE
BANKRUPTCY SECTION
POST OFFICE BOX 22808
JACKSON MS 39225-2808

NORTH MILL EQUIPMENT FI
PO BOX 77840
SPRINGFIELD OH 45501-7840

USPS FIRST CLASS MAIL RECIPIENTS: Parties with names struck through or labeled "NO SERVICE" will be served via First Class USPS Mail Service.

NORTH MILL EQUIPMENT FINANCE LLC
601 MERRITT 7 SUITE 5
NORWALK CT 06851-1097

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RICHMOND VA 23286-0001

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GREENSBORO NC 27402-6131

WEBB TRUCKING LLC
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CLEVELAND MS 38732

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

In Re: Campbell Family Enterprises, Inc) Case No.: 25-10364-SDM
Debtor(s)) Chapter: 11
) Judge: Selene D. Maddox
)

PLEASE TAKE NOTICE that a hearing will be held at

Go to Zoom.us/join, Enter Meeting ID 160 853 64415, and Passcode 3699380, OR
call (646) 828-7666

on 8/28/25 at 10:00 AM

Responses Due: 8/4/25

to consider and act upon the following:

79 – Motion to Dismiss Case Filed by Thomas C. Rollins Jr. on behalf of Campbell Family Enterprises, Inc. (Rollins, Thomas)

This hearing will be conducted by VIDEO. For procedures regarding video hearings, please see the Standing Order Regarding Video Hearings Before Judge Selene D. Maddox available on the Standing Orders page of the Court's website at www.msnb.uscourts.gov.

Should any party receiving this notice respond or object to said motion such response or objection is required to be filed with the Clerk of this court and served on the Attorney for Movant on or before said response due date. If any objection or response is filed, an evidentiary hearing will be held on the above mentioned date regarding any facts not stipulated to by the parties. If no objection or response is filed, the Court may consider said motion immediately after the objection or response due date. Please note that a corporation, partnership, trust, or other business entity, other than a sole proprietorship, may appear and act in Bankruptcy Court only through a licensed attorney.

A copy of the motion is required to be served pursuant to Rules 9013 and 9014. THE MOVING PARTY'S ATTORNEY IS REQUIRED BY THE STANDING ORDER TO PERFORM NOTICING AS TO SAID MOTION, THE NOTICE OF HEARING, AND THE OBJECTION DEADLINE, ACCORDING TO THE TERMS OF SAID STANDING ORDER. Please see the Standing Order available at:
http://www.msnb.uscourts.gov/sites/msnb/files/so_notic_revised.pdf

Dated: 7/9/25

Shallanda J. Clay
Clerk, U.S. Bankruptcy Court

BY: VSD
Deputy Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Campbell Family Enterprises, Inc, Debtor **Case No. 25-10364-SDM**
CHAPTER 11

DEBTOR'S MOTION TO DISMISS CHAPTER 11 CASE

COMES NOW, Campbell Family Enterprises, Inc. (“Debtor”), by and through counsel, and moves this Court to Dismiss this chapter 11 case, and in support thereof, would respectfully show the Court as follows:

1. Pursuant to 11 U.S.C. § 1112(b)(1), the Debtor seeks dismissal of its Chapter 11 case on the grounds that (a) there is cause for dismissal because the Debtor has ceased operations, is incurring continuing losses, and lacks the ability to comply with its confirmed plan; and (b) dismissal is in the best interests of creditors and the estate.
2. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.
3. On June 27, 2025, the Court entered an order confirming the Debtor’s Second Amended Plan of Reorganization (the “Plan”). The Plan anticipated that the Debtor would continue its trucking operations, generate revenue, and make required post-confirmation plan payments to secured and unsecured creditors.
4. Since confirmation, the Debtor has suffered a series of crippling events:
 - a. Multiple mechanical breakdowns of its trucks have rendered its fleet inoperable;
 - b. A driver resigned and temporarily refused to return the truck, effectively “holding it hostage”;
 - c. Other drivers refused to work around the recent holiday, further halting operations;

d. The Debtor was unable to maintain required insurance on its vehicles, and has therefore parked all trucks.

As a result, the Debtor has no ongoing revenue, cannot meet its insurance obligations, and is unable to make distributions under the Plan.

5. Section 1112(b)(1) of the Bankruptcy Code provides that, on request of a party in interest and after notice and a hearing, the Court shall dismiss a Chapter 11 case “for cause.” 11 U.S.C. § 1112(b)(1). Cause exists here because:

a. The Debtor has experienced a substantial or continuing loss to the estate and there is no reasonable likelihood of rehabilitation. § 1112(b)(4)(A).

b. The Debtor has been unable to effectuate substantial consummation of its Plan. § 1112(b)(4)(J).

c. The Debtor is unable to comply with its obligations under the confirmed Plan. § 1112(b)(4)(M).

Once the Debtor ceased generating revenue—due to mechanical failures, driver issues, and lack of insurance—its Plan became infeasible. The Debtor cannot pay post-confirmation administrative expenses, fund insurance premiums, or make Plan payments.

6. Conversion to Chapter 7 is not an option: there is no unencumbered property available to fund a liquidation, and the administrative burden of a Chapter 7 trustee would unnecessarily deplete estate assets. Dismissal, rather than conversion, allows secured creditors to pursue their state-law remedies against the Debtor’s collateral without the costs and delay of a sale under Section 363. Dismissal preserves creditor rights and avoids further administrative diminution of the estate.

WHEREFORE, the Debtor respectfully requests that the Court enter an order, substantially in the form attached hereto:

- A. Granting this Motion;
- B. Dismissing the Debtor's Chapter 11 case; and
- C. Granting such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Campbell Family Enterprises, Inc.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr., MSB 103469
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P.O. Box 13767,
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., attorney for Campbell Family Enterprises, Inc., do hereby certify that I have this date electronically transmitted via CM/ECF Noticing, a true and correct copy of the above and foregoing MOTION to the following on the day and year hereinafter set forth:

Robert A. Byrd
rab@byrdwiser.com, rbyrdMSN@ecf.axosfs.com

Robert A. Byrd on behalf of Trustee Robert A. Byrd
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Robert Alan Byrd on behalf of Trustee Robert A. Byrd
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Arnulfo U. Luciano on behalf of Creditor Cleveland State Bank
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U. S. Trustee
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United States Trustee
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Steven Usry on behalf of U.S. Trustee U. S. Trustee
steven.usry@usdoj.gov, cara.pardue@usdoj.gov

SO CERTIFIED, this the 9th day July, 2025.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.